

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re: NAJEEB AHMED KHAN,  Debtor.	Chapter 11 Case No. 19-04258 (SWD)
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**NOTICE OF CHAPTER 11 TRUSTEE’S MOTION FOR AUTHORITY TO SELL  
(I) 2010 SUNSEEKER MANHATTAN 60 YACHT, AND (II) 2018 WILLIAMS JET  
TENDERS 385s TURBOJET, FREE AND CLEAR OF ALL LIENS, INTERESTS AND  
ENCUMBRANCES WITH LIENS, INTERESTS AND ENCUMBRANCES ATTACHING  
TO THE PROCEEDS OF SALE, PURSUANT TO 11 U.S.C. § 363(b) AND § 363(f)**

**PLEASE TAKE NOTICE** that on December 30, 2019 the Chapter 11 Trustee filed the *Chapter 11 Trustee’s Motion for Authority to Sell (I) 2010 Sunseeker Manhattan 60 Yacht, and (II) 2018 Williams Jet Tenders 385s TurboJet, Free and Clear of All Liens, Interests and Encumbrances with Liens, Interests and Encumbrances Attaching to the Proceeds of Sale, Pursuant to 11 U.S.C. § 363(b) and § 363(f)* (the “**Motion**”).

**PLEASE TAKE FURTHER NOTICE** that any responses or objections to the Motion must be in writing and filed with the Clerk of the Court, U.S. Bankruptcy Court for the Western District of Michigan, 1 Division Ave. N, Room 200, Grand Rapids, MI 49503, so as to be received on or before **January 20, 2020 at 4:00 p.m. (prevailing Eastern Time)**.

**PLEASE TAKE FURTHER NOTICE** that at the same time, you must also serve a copy of the response or objection upon: (i) the Chapter 11 Trustee, Mark T. Iammartino, Development Specialists Inc., 10 S. LaSalle Street, Suite 3300, Chicago, IL 60603, email: [miammartino@dsiconsulting.com](mailto:miammartino@dsiconsulting.com) and (ii) counsel to the Chapter 11 Trustee, Neal, Gerber & Eisenberg LLP, Two N. LaSalle Street, Suite 1700, Chicago, IL 60602 (Attn: Nicholas M. Miller), email: [nmiller@nge.com](mailto:nmiller@nge.com).

**PLEASE TAKE FURTHER NOTICE** that if you fail to respond in accordance with this notice, the court may grant the relief requested in the Motion without further notice or hearing.

**PLEASE TAKE FURTHER NOTICE** that if an objection is properly filed and served in accordance with the above procedures, a hearing will be held on **January 23, 2020 at 11:00 a.m. (prevailing Eastern Time)** before the Honorable Scott W. Dales, United States Bankruptcy Judge for the Western District of Michigan, U.S. Courthouse & Federal Building, 410 West Michigan,

Room 114, Kalamazoo, MI 49007. Only objections made in writing and timely filed will be considered by the bankruptcy court at such hearing.

Dated: December 30, 2019

Respectfully submitted,

**MARK IAMMARTINO, Chapter 11 Trustee**

/s/ Nicholas M. Miller

Nicholas M. Miller

Thomas C. Wolford

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**CERTIFICATE OF SERVICE**

Nicholas M. Miller hereby certifies that on December 30, 2019, he caused a true and correct copy of the *Chapter 11 Trustee's Motion for Authority to Sell (I) 2010 Sunseeker Manhattan 60 Yacht, and (II) 2018 Williams Jet Tenders 385s TurboJet, Free and Clear of All Liens, Interests and Encumbrances with Liens, Interests and Encumbrances Attaching to the Proceeds of Sale, Pursuant to 11 U.S.C. § 363(b) and § 363(f)* to be filed electronically with the Clerk of the court using the CM/ECF system. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties listed on the electronic filing receipt. Parties may access this filing through the Court's system.

Additionally, on December 30, 2019, I caused the parties listed below and on the attached creditor matrix printed from the Court's website on December 30, 2019 to be served a copy of the foregoing via U.S. First Class Mail:

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/s/ Nicholas M. Miller

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National Supply LLC  
Jones Law Office LLC  
205 W. Jefferson Blvd., Ste. 200  
South Bend, IN 46601-1810

Neo Manufacturing, LLC  
Attn: Serena Corder  
21900 US 12  
Sturgis, MI 49091-9295

OMNI TECHNOLOGIES INC.  
C/O JONES LAW OFFICE LLC  
205 W. JEFFERSON BLVD. STE 200  
SOUTH BEND, IN 46601-1810

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Nancy J Gargula  
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Columbus OH 43215-3414

Charity Anne Olson  
Olson Law Group  
P.O. Box 64  
Hartland, MI 48353-0064

Omni Technologies Inc  
c/o Andrew Beare Jones  
205 W. Jefferson Boulevard  
Suite 200  
South Bend IN 46601-1810

Original Colanese Products  
Jones Law Office LLC  
205 W. Jefferson Blvd., Ste. 200  
South Bend, IN 46601-1810

Stanley F. Orszula  
Barack Ferrazzano Kirschbaum & Nagelberg  
200 W. Madison Street, Suite 3900  
Chicago, IL 60606-3465

PARKSIDE PHARMACY, INC.  
C/O JONES LAW OFFICE LLC  
205 W. JEFFERSON BLVD. STE 200  
SOUTH BEND, IN 46601-1810

PERFORMANCE MACHINE TECHNOLOGIES, INC.  
C/O JONES LAW OFFICE LLC  
205 W. JEFFERSON BLVD. STE 200  
SOUTH BEND, IN 46601-1810

PETER THORNTON  
DBA THORTON LANDSCAPING  
C/O JONES LAW OFFICE LLC  
205 W JEFFERSON BLVD STE 200  
SOUTH BEND IN 46601-1810

PETER THORNTON DBA THORNTON LANDSCAPING COMP  
C/O JONES LAW OFFICE LLC  
205 W. JEFFERSON BLVD. STE 200  
SOUTH BEND, IN 46601-1810

PIETRO'S COAL OVEN PIZZERIA, INC.  
C/O JONES LAW OFFICE  
205 W. JEFFERSON BLVD. STE 200  
SOUTH BEND, IN 46601-1810

PIETROS COAL OVEN PIZZERIA  
C/O JONES LAW OFFICE LLC  
205 W. JEFFERSON BLVD. STE 200  
SOUTH BEND, IN 46601-1810

PIETROS ITALIAN RESTAURANT  
C/O JONES LAW OFFICE LLC  
205 W. JEFFERSON BLVD. STE 200  
SOUTH BEND, IN 46601-1810

PIETROS WALNUT PIZZERIA  
C/O JONES LAW OFFICE LLC  
205 W. JEFFERSON BLVD. STE 200  
SOUTH BEND, IN 46601-1810

PNC Equipment Finance LLC  
Luci Johnson Sr VP Aviation  
4355 Emerald Street  
Suite 100  
Boise ID 83706-2053

PRECISION WALL SYSTEMS, INC.  
C/O JONES LAW OFFICE LLC  
205 W. JEFFERSON BLVD. STE 200  
SOUTH BEND, IN 46601-1810

Parkside Pharmacy Inc  
c/o Andrew Beare Jones  
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205 W. Jefferson Boulevard  
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South Bend IN 46601-1810

Pietro's Coal Oven Pizzeria  
c/o Andrew Beare Jones  
205 W. Jefferson Boulevard  
Suite 200  
South Bend IN 46601-1810

Pietro's Italian Restaurant  
c/o Andrew Beare Jones  
205 W. Jefferson Boulevard  
Suite 200  
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Pietro's Walnut Pizzeria  
c/o Andrew Beare Jones  
205 W. Jefferson Boulevard  
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Polygon Company  
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South Bend, IN 46601-2093

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Postle Operating, LLC  
601 East Beardsley Ave  
Elkhart, IN 46514-3305

Precision Wall Systems, Inc  
c/o Andrew Beare Jones  
205 W. Jefferson Boulevard  
Suite 200  
South Bend IN 46601-1810

Quality Truck Parts  
c/o Andrew Beare Jones  
205 W. Jefferson Boulevard  
Suite 200  
South Bend IN 46601-1810

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c/o Becker & Poliakoff, P.A.  
1 E. Broward Blvd.  
Suite 1700  
Ft. Lauderdale, FL 33301-1862

Regency Island Dunes Association, Inc.  
Becker & Poliakoff, P.A.  
1 E. Broward Blvd, Suite 1700  
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Coldwater, MI 49036-2400

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Neo Manufacturing, LLC  
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SUITE 900  
CHICAGO, IL 60604-2815

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C/O JONES LAW OFFICE LLC  
205 W. JEFFERSON BLVD. STE 200  
SOUTH BEND, IN 46601-1810

SOUTHWEST GAS CORPORATION  
2200 N CENTRAL  
SUITE 101  
PHOENIX AZ 85004-1419

SOUTHWEST GAS CORPORATION  
PO BOX 98890  
LAS VEGAS NV 89193-8890

STANDARDIZED FOOD SERVICE SYSTEMS, INC.  
C/O JONES LAW OFFICE LLC  
205 W. JEFFERSON BLVD. STE 200  
SOUTH BEND, IN 46601-1810

SUBWAY SYSTEMS LLC  
C/O JONES LAW OFFICE LLC  
205 W. JEFFERSON BLVD. STE 200  
SOUTH BEND, IN 46601-1810

SWM Math, LLC  
210 South Michigan Street  
Suite 500  
South Bend, IN 46601-2093

Schoberg & Schoberg Inc  
c/o Andrew Beare Jones  
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Semco Energy Gas Company  
PO Box 5004  
Port Huron MI 48061-5004

Semco Energy Gas Company  
Port Huron MI 48061-5004

Shoreline Growers, Inc.  
c/o Andrew Beare Jones  
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Standardized Food  
Service Systems, Inc.  
c/o Andrew Beare Jones  
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South Bend IN 46601-1810

Subway Systems, LLC  
c/o Andrew Beare Jones  
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Superior Tire, LLC  
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c/o W. Randall Kammeyer, Esq.  
116 East Berry Street  
Lincoln Tower Suite 302  
Fort Wayne, IN 46802-2487

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M BOARDLEY FINANCE DIRECTOR  
PO BOX 577  
GOSHEN IN 46527-0577

TIMEPLUS SYSTEMS INC  
C/O ANDREW TODD KIGHT  
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INDIANAPOLIS IN 46204-2005

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The Roundabouts Consultancy Ltd  
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Petworth  
West Sussex, England  
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The Village: A Community Musical Arts Allian  
Jones Law Office LLC  
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GRAND RAPIDS, MI 49503-2837

UNIVERSAL CREDIT SERVICES INC  
3582 AVON STREET  
PO BOX 158  
HARTLAND MI 48353-0158

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Western District of Michigan  
Bankruptcy Section  
PO Box 208  
Grand Rapids MI 49501-0208

Universal Credit Services, Inc.  
c/o Olson Law Group  
P.O. Box 64  
Hartland MI 48353-0064

Versatile Automation Tech Inc  
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WIKEL DAILEADER O'BRIEN  
 MCCORMICK TIEBOUT WITEK  
 & INTERLOGIC OUTSOURCING INC  
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 ELKHART IN 46514-5446

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 Wardrop & Wardrop, P.C.  
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 Brook IL 60522-4928

Xfinity  
 PO Box 70219  
 Philadelphia PA 19176-0219

YENSID JR., LLC  
 C/O JONES LAW OFFICE LLC  
 205 W. JEFFERSON BLVD. STE 200  
 SOUTH BEND, IN 46601-1810

Yensid Jr, LLC dba  
 Active Health & Wellness Ctr  
 c/o Andrew Beare Jones  
 205 W. Jefferson Blvd, Ste 200  
 South Bend IN 46601-1810

aps  
 PO Box 2906  
 Phoenix AZ 85062-2906

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified  
 by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Discover Financial Services  
 PO Box 15316 Wilmington  
 Wilmington DE 19850

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 Bankruptcy Section  
 100 North Senate Avenue  
 Indianapolis, IN 46204

Internal Revenue Service  
 3251 N. Evergreen Drive, NE  
 Insolvency Group 4, Stop 93  
 Grand Rapids MI 49525

Michigan Unemployment Insurance Agency  
 3024 West Grand Blvd.  
 Tax Office, Suite 12-300  
 Detroit, MI 48202

Addresses marked (c) above for the following entity/entities were corrected  
 as required by the USPS Locatable Address Conversion System (LACS).

Khan Aviation, Inc.  
 25235 Leer Drive  
 Elkhart IN 46514